

IN THE SUPERIOR COURT OF FULTON COUNTY

STATE OF GEORGIA

COALITION FOR GOOD  
GOVERNANCE, et al,

\*

Plaintiffs,

\*

CIVIL ACTION FILE

VS.

\*

NUMBER: 2018CV313418

ROBYN A. CRITTENDEN,  
Et al,

\*

Defendants

\*

**ORDER GRANTING PLAINTIFF'S MOTION TO  
SUPPLEMENT THE RECORD**

Plaintiff's Motion to Supplement the Record, having been considered and all parties having agreed and the Court's Exhibit "A" attached being added thereto the Motion to Supplement the Record is GRANTED.

SO ORDERED, this the 30 day of January 2019.



\_\_\_\_\_  
SENIOR JUDGE ADELE P. GRUBBS  
STATE OF GEORGIA

**Grubbs, Adele**

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**From:** Grubbs, Adele  
**Sent:** Monday, January 14, 2019 11:03 AM  
**To:** Davis, Thomas  
**Subject:** Re: Message from WILKIE JORDAN (2143921888)

Tom,

If you would. You know more about getting records than I do.

Thank you

Adele

Sent from my iPhone

On Jan 14, 2019, at 10:52 AM, Davis, Thomas <[Thomas.Davis@cobbcounty.org](mailto:Thomas.Davis@cobbcounty.org)> wrote:

Judge,

This is a message from a journalist, he does not say from what outlet, who wants to talk to you about getting access to some sort of records in Fulton County regarding the election challenge, how would you like me to respond?

Thank you,

Thomas L. Davis  
Staff Attorney to the Senior Judges  
Cobb County Superior Court  
(770) 528-8091  
[Thomas.Davis@cobbcounty.org](mailto:Thomas.Davis@cobbcounty.org)

**From:** unityconnection  
**Sent:** Monday, January 14, 2019 9:56 AM  
**To:** Davis, Thomas <[Thomas.Davis@cobbcounty.org](mailto:Thomas.Davis@cobbcounty.org)>  
**Subject:** Message from WILKIE JORDAN (2143921888)

<VoiceMessage.wav>

*Exhibit A*

I have been in touch with the attorneys in this matter. There is a confidentiality agreement in regard to discovery in this case, therefore the press does not have access to the discovery process including observing as far as anything to do with the lawsuit is concerned. However, the trial will, of course, be public.

Adele Grubbs  
Senior Judge

On Mon, Jan 14, 2019 at 10:18 AM Jordan Wilkie <wilkie.jordant@gmail.com> wrote:

Dear Judge Grubbs,

I am a reporter focused on election security and integrity. I was in your courtroom last week.

I am currently at Fulton County election warehouse where both parties just went back into the back room to inspect the machines.

Could I have clarity on the level of access that I, as a member of the press, should be allowed?

I understand that there is a confidentiality agreement for viewing internal memoranda ----- Message truncated

Adele Grubbs <adele.grubbs@gmail.com>  
To: josh.belinfonte@robbinslawfirm.com

Mon, Jan 14, 2019 at 11:47 AM

[Quoted text hidden]

----- Forwarded message -----

From: Adele Grubbs <adele.grubbs@gmail.com>  
To: Jordan Wilkie <wilkie.jordant@gmail.com>, bbrown@brucepbrownlaw.com,  
josh.belinfonte@robbinslaw.com  
Cc:  
Bcc:  
Date: Mon, 14 Jan 2019 11:45:11 -0500  
Subject: Re: Journalistic access to Lt. Gov challenge  
Mr. Wilkie,

I have been in touch with the attorneys in this matter. There is a confidentiality agreement in regard to discovery in this case, therefore the press does not have access to the discovery process including observing as far as anything to do with the lawsuit is concerned. However, the trial will, of course, be public.

Adele Grubbs  
Senior Judge

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I understand that there is a confidentiality agreement for viewing internal memoranda ----- Message truncated

Jordan Wilkie <wilkie.jordant@gmail.com>  
To: Adele Grubbs <adele.grubbs@gmail.com>  
Cc: bbrown@brucepbrownlaw.com, josh.belinfonte@robbinslaw.com

Mon, Jan 14, 2019 at 12:02 PM

Your honor,

Thank you for the speedy response. Does that pertain to the public records that will be a part of discovery (as per your court order)?

Even if I cannot be party to the discovery itself, can I observe or can you grant permission to the parties to tell me what level of access is being granted to the machines? That should avoid all issues of confidentiality, as I understand them, and I apologize if I'm off base. It would also answer the main question I need in my reporting. Are cyber security experts actually getting to review the internal memory and programming of DRE machines?

Finally, could you tell me which parties protested my attendance? What would be the case if the defendants and a county would allow me to be there, but not the secretary of state's office? Since they're not a party, would they have a say? I have had many issues with gaining access to public information and public records through their office before and am therefore concerned about their stance.

Thank you,  
Jordan Wilkie  
214.392.1888

P.S. Please forgive any typos as I am writing from my phone.

[Quoted text hidden]

Adele Grubbs <adele.grubbs@gmail.com>  
To: Jordan Wilkie <wilkie.jordant@gmail.com>  
Cc: bbrown@brucepbrownlaw.com, josh.belinfonte@robbinslaw.com

Mon, Jan 14, 2019 at 12:11 PM

Mr. Wilkie,

You do not have access to the process of discovery or the items produced. Nor may you observe at this time. There is a Court order indicating what is discoverable and it is available to the public.

Adele Grubbs

Senior Judge  
[Quoted text hidden]

Mail Delivery Subsystem <mailer-daemon@googlemail.com>  
To: adele.grubbs@gmail.com

Mon, Jan 14, 2019 at 12:11 PM

[Quoted text hidden]

Final-Recipient: rfc822; josh.belinfonte@robbinslaw.com

Action: failed

Status: 5.1.1

Remote-MTA: dns; mx1.smtp.exch081.serverdata.net. (64.78.25.102, the server for the domain robbinslaw.com.)

Diagnostic-Code: smtp; 550 5.1.1 <josh.belinfonte@robbinslaw.com>: Recipient address rejected: User unknown in relay recipient table

Last-Attempt-Date: Mon, 14 Jan 2019 09:11:42 -0800 (PST)

**IN THE SUPERIOR COURT OF FULTON COUNTY  
STATE OF GEORGIA**

**COALITION FOR GOOD  
GOVERNANCE, RHONDA J.  
MARTIN, SMYTHE DUVAL, AND  
JEANNE DUFORT,**

**Plaintiffs,  
v.**

**ROBYN A. CRITTENDEN,  
Secretary of State of Georgia,  
et al.,**

**Defendants.**

**CIVIL ACTION FILE  
NO. 2018CV313418**

**NOTICE OF FILING ORIGINAL TRANSCRIPTS**

On February 1, 2019, Plaintiffs filed the following original transcripts with the Superior Court Clerk:

1. December 5, 2018 Hearing Transcript;
2. December 9, 2018 Hearing Transcript;
3. January 17, 2019 Hearing Transcript;
4. January 18, 2019 Hearing Transcript.

There being no other transcripts to be filed, this case is ready for transmittal to the Supreme Court of Georgia.

DATED: February 1, 2019.

/s/Bruce P. Brown 

Bruce P. Brown

Georgia Bar No. 064460

BRUCE P. BROWN LAW LLC

1123 Zonolite Rd. NE, Suite 6

Atlanta, Georgia 30306

(404) 881-0700

*Attorney for Plaintiffs*

**CERTIFICATE OF SERVICE**

I have this day served a copy of the foregoing via the Court's e-filing system to all counsel or record.

This 1<sup>st</sup> day of February, 2019.

A handwritten signature in black ink, appearing to read 'B. Brown', is written over a horizontal line.

Bruce P. Brown  
Georgia Bar No. 064460  
BRUCE P. BROWN LAW LLC  
1123 Zonolite Rd. NE, Suite 6  
Atlanta, Georgia 30306  
(404) 881-0700

*Attorney for Plaintiffs*